



# State Historic Preservation Office

## Montana Historical Society

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February 8, 1989

Received 2-21-89

Scott Brown  
Environmental Protection Agency  
Montana Office, Region VIII  
Federal Building  
301 South Park Avenue, Drawer 10096  
Helena, MT 59626-0096

Re: East Helena Smelter NPL Site  
Meeting of February 7

Dear Scott:

This letter will serve to document the initiation of Section 106 consultation for the project referenced above, and to summarize our understanding of the compliance process we have agreed upon to date. Using GCM Services Inc., ASARCO will complete inventory and evaluation of the East Helena smelter complex including ponds, and of the Wilson Ditch as soon as possible. They will also begin consideration of the area of potential environmental effect within the East Helena townsite, relying on Sandborn Maps to document dates of construction and windshield survey techniques to establish the presence of potentially significant buildings and/or Historic Districts located within that area. The latter body of work will be designed to provide baseline information should more intensive soil sampling indicate remedial actions with the potential to impact significant cultural resources are necessary.

With regard to future sampling needs, it is our understanding that sampling methodologies to be used are relatively non-impacting and will substantially consist of trowel-sized soil samples collected by hand. Under those parameters, we have no major concerns with continued, more intensive sampling within the yards of East Helena homes. We do ask that you initiate additional consultation if either sampling scope or methodology changes.

Copies of this letter will be sent to all parties represented at our meeting yesterday, and we would appreciate notification from any of you if our summary understanding and yours don't match.

Sincerely,

*Katherine M. Huppe*  
Katherine M. Huppe  
Historical Survey Reviewer

cc: Jon Nickel  
Kevin Kirley  
GCM Services

File: EPA Superfund/ASARCO

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